

Easterling, Deborah

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3-17-2020

From: Boyd, Jocelyn
Sent: Monday, March 16, 2020 3:08 PM
To: Easterling, Deborah
Subject: RE: [External] COVID-19 and South Carolina Lifeline response

1997-239-C 290948

2020-106-A

Please docket.

Begin forwarded message:

From: Senator Hill <judson@judsonhill.com>
Date: March 16, 2020 at 2:30:56 PM EDT
To: "Randall, Randy" <Randy.Randall@psc.sc.gov>
Subject: [External] COVID-19 and South Carolina Lifeline response

Chairman Randall,

I hope you are doing well. We may have met at NARUC.

This request relates to COVID-19 and Lifeline ETCs operating in South Carolina. I also attach a letter I sent to FCC Chairman Ajit Pai at his request outlining important needed changes to the Lifeline program during this national emergency to provide lower income Americans a critical lifeline.

The request is for the South Carolina Commission to place a moratorium or otherwise suspend the requirement for Lifeline ETCs operating in South Carolina to drop their customers for non-usage or for failed re-certifications for 6 to 9 months or until the national emergency is lifted.

I understand that Friday the state of West Virginia and Pennsylvania initiated this moratorium and today Georgia is initiating an order to do the same.

As you know, Lifeline devices provide lower income Americans and many veterans access to critical services and helps them to stay in touch with their employer or find a job, provides access to education opportunities and now to educators since schools are out, and gives a subscriber access to healthcare providers and emergency first responders.

As you know, many subscribers are dropped because they do not use their phones often enough, or they are dropped during re-certification sometimes due to the clumsiness of the re-certification process.

I am available to discuss this with you, if it's helpful. I'd also like to know your thoughts on this proposal.

Thanks for your consideration. I look forward to talking soon if I can be helpful.

Sen. Judson Hill, Esq.

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MAR 17 2020

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JUDSON H. HILL, ESQ.

March 13, 2020

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: TruConnect's recommendations on temporary changes to the Lifeline program in response to the national emergency created by the COVID-19 virus

Dear Chairman Pai:

As you and the Commission respond to the ever changing national challenges presented by the COVID-19 virus, on behalf of TruConnect, LLC, which is a Lifeline provider, I wish to offer several recommendations that will help the President and the Federal Communications Commission (FCC) most effectively ensure that the most vulnerable Americans are well served as they prepare for and respond to the COVID-19 virus conditions. Today, President Trump talked about the importance of ensuring healthcare access to the elderly and those with already existing healthcare challenges – many who are on the Medicaid program or who are low income veterans, all eligible for Lifeline. The President also discussed the importance of using telemedicine services and expanding healthcare access remotely. Under your leadership and through the work of Commissioner Carr, other Commissioners and the Commission's staff, the Commission is already working to advance telemedicine solutions. Lifeline devices may be the best technology solution for lower income Americans to remotely access healthcare providers. As you know, Lifeline devices are very advanced and can be used by subscribers to access essential healthcare services, a job, educational programs or to call an emergency first responder.

We ask you to take serious and immediate consideration of the following proposed temporary changes to the Lifeline program to address this national emergency.

1. Freeze customer recertification disconnections. Place a moratorium of 6 to 9 months so existing Lifeline subscribers are not disconnected from wireless service nor to their important access to the internet for themselves and their children. This freeze would not force a subscriber to stay on the program if they wish to cancel. Many people are unnecessarily dropped because in some states the recertification process is conducted using a letter sent to the subscriber's last known address. If the subscriber does not respond in time, then the Commission regulations require the ETC to drop the individual from the program. Please note that today, the state of West Virginia sent ETCs a notice advising they cannot drop Lifeline customers so they can keep their continued access to their jobs, healthcare providers and first responders.
2. Freeze customer 30-day non-usage requirements. Place a moratorium of 6 to 9

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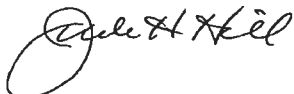
months so existing Lifeline subscribers are not disconnected for non-usage. Some Lifeline subscribers do not use their device as often as is required by the Commission. Often these people are older and have more vulnerable health conditions. This moratorium will preclude disconnecting subscribers from their wireless and broadband service for non-usage because the service can truly be a lifeline for themselves and their children.

3. Expand data availability to Lifeline subscribers by increasing reimbursements to Lifeline providers in all states for 6 to 9 months. The recommendation includes NLAD states so that Lifeline providers can afford to offer smart devices to every subscriber in those states. Subscribers are lower income and sometimes elderly Americans and veterans. Increasing Lifeline provider reimbursements allows providers to offer additional data to help individuals impacted by school and university closings participate in online instruction, access healthcare providers more easily or to use the device for telemedicine services. Remote access to healthcare allows people to conduct a long-distance visit to a healthcare facility can enable them to get treated faster and can be safer for providers during this national emergency.
4. Suspend the coming 2021 Minimum Service Requirements mandate for 18 months (freeze the current minimum services standards ordered the end of 2019) and suspend the new Lifeline commission prohibition for 9 months. The automatic service standard change comes at the worst time as subscribers need to be able to rely on consistent access to both wireless and broadband services. These ETCs are largely small businesses. The ever-changing regulatory environment hinders their ability to focus on and fully service the program's Congressional intent. This recommendation will enable providers to continue to efficiently enroll more eligible needy Americans who need a lifeline to address the challenges this emergency has created.
5. Re-start the FCC's consideration of ETC applications in states that defaulted Lifeline ETC approvals to the Commission. These states are TN, NC, FL, VA, AL, DC, DE, ME, CT, and MA. New York just changed its law to reclaim their in-state ETC authorization since the Commission has not considered the pending ETC state related applications for over 8 years. Re-starting consideration of these applications is important because often only one Lifeline ETC is approved to operate in the state severely limiting access to these important services for a vulnerable population. Now is not the time to directly or indirectly restrict any Americans' access to wireless and broadband services for affordability reasons when this decades old federal program was designed for this very purpose.
6. Place a hold on ETC audits for 9 months to not hinder the ETCs, which are mostly small businesses, from actively focused on delivering this important service to eligible Americans - those most in need and most vulnerable to a national emergency like COVID-19.
7. To help root out any remaining waste, fraud and abuse in the program, place a 90 day port freeze on subscribers' churning – or switching ETC's (with a few exceptions) to create program stability and encourage Lifeline providers to place

new technologies, such as telemedicine applications, on devices give subscribers better remote access to healthcare providers.

I am available to talk with you, with other Commissioners and with your staff to discuss each of these recommendations in detail, and to be a resource to help the Commission to quickly address the crisis at hand. Thank you.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Judson H. Hill".

Judson H. Hill, Esq.

cc: Commissioner Brendan Carr
Commissioner Michael O'Rielly
Commissioner Jessica Rosenworcel
Commissioner Geoffrey Starks